

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS
EASTERN DIVISION

In re:)
)
WATER'S EDGE LIMITED)
PARTNERSHIP)
)
Debtor.) Chapter 11
Case No. 24-12445-CJP

**MOTION TO DISMISS DEBTOR'S CHAPTER 11 CASE FOR
FAILURE TO PROVIDE PROOF OF ADEQUATE INSURANCE COVERAGE
AND REQUEST FOR EMERGENCY DETERMINATION
(WITH CERTIFICATE OF SERVICE)**

Pursuant to 28 U.S.C. §§ 586(a)(3)(G), (a)(8) and 11 U.S.C. § 1112(b), the United States Trustee (the "United State Trustee") moves this Court for an order dismissing the above-captioned chapter 11 case for cause based on the failure of debtor Water's Edge Limited Partnership (the "Debtor") to carry and provide proof of adequate property and liability insurance coverage for its real property, which appears to include multiple apartment buildings—one of which has a non-working fire protection system and was recently condemned due to code violations. The full extent of the Debtor's real property holdings and coverage needs are unclear, as Debtor's counsel has been non-responsive to inquiries from the United States Trustee about the case since the filing.

The U.S. Trustee seeks an emergency determination and hearing on this Motion because of the potential for immediate and incalculable administrative claims against the Debtor's estate and harm to creditors and the public due to the apparent lack of adequate insurance coverage for its properties, which are located in a densely inhabited and traversed area of Revere.

In further support of this Motion, the U.S. Trustee states as follows: